

## **AKILOV LAW, PC**

147-44 Jewel Ave | Flushing, NY 11367  
T: 646-361-6274 | E-mail: makilov1@gmail.com

May 24, 2023

**Via ECF**

Hon. Dora L. Irizarry  
United States District Court  
District of New York  
225 Cadman Plaza E  
Brooklyn, NY 11201

**Re:    *Meerovich v. Big Apple Institute, Inc.*  
      *Civil Case 1:22-cv-7625*  
      *Letter Motion for Extension of Time***

Dear Judge Irizarry:

My firm represents the Plaintiff in this case. I write to respectfully request a thirty(30) day extension of time to oppose Defendants' motion.

Pursuant to II(D) of this Court's individual rules, Plaintiff respectfully submits that: (i) additional time is needed for Plaintiff to meet with his counsel in person to prepare an affidavit concerning the facts and circumstances surrounding the purported arbitration agreement; (ii) the original deadline falls on Friday, May 26, 2023 pursuant to Local Civil Rule 6.1; (iii-iv) there have been previous requests for an extension of this deadline; (v) Defendants consent; and (vi) Plaintiff requests until Monday, June 26, 2023 to submit opposition to Defendants' motion.

Accordingly, there exists good cause for an extension of time under Rule 6. I thank this Court for its anticipated courtesies.

Dated: Flushing, New York  
May 24, 2023

Sincerely yours,

/s/ Mark Akilov, Esq.  
Mark Akilov